

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARTIN J. WALSH, Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

LOCAL 98, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS,

Defendant.

CIV. ACTION NO.

2:21-cv-00096

Hon. Gerald A. McHugh

**DEFENDANT'S ANSWER TO PLAINTIFF'S
MOTION TO AMEND COMPLAINT**

Defendant, Local 98, International Brotherhood of Electrical Workers, by and through its lawyers, Lamb McErlane PC, do not oppose Plaintiff's Motion to Amend the Complaint. However, Defendant reserves the right to seek dismissal of, and/or to have stricken, those portions of the Amended Complaint which do not comply with (a) this Court's Order and Memorandum dated April 14, 2021, or (b) the law and/or procedural rules, after the Amended Complaint is filed.

Respectfully submitted,

LAMB MCERLANE, PC

Dated: July 15, 2021

By: /s/ Joseph R. Podraza, Jr.

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